

UNITED STATES DISTRICT COURT
for the
District of Massachusetts

United States of America v.)
)
Vladislav Dmitriyevich Klyushin, a/k/a Vladislav Kliushin,)
Ivan Sergeyevich Ermakov, a/k/a Ivan Yermakov,)
Igor Sergeevich Sladkov,)
Mikhail Vladimirovich Irzak, a/k/a Mikka Irzak, and)
Nikolai Mikhaylovich Rumiantcev, a/k/a Nikolay Rummyantsev)

Case No. 21-MJ-2090 (MBB) (under seal)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2018 to 2020 in the county of Suffolk in the
District of Massachusetts, the defendant(s) violated:

Code Section

18 U.S.C. § 371

Offense Description

Conspiracy to commit computer intrusion, wire fraud, and securities fraud, contrary to 18 U.S.C. §§ 1030(a)(4) & 1343 and 15 U.S.C. §§ 78j(b) and 78ff(a).

DOCKETED

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT OF SPECIAL AGENT BJ KANG

☒ Continued on the attached sheet.

Sworn to me telephonically.

Date:

03/24/2021

March 20, 2021
@ 5:01 PM

City and state:

BROOKLINE, MASSACHUSETTS

B.J. Kang by MBB
Complainant's signature

FBI SPECIAL AGENT BJ KANG

Printed name and title

Marianne B. Bowler
Judge's signature

HONORABLE MARIANNE B. BOWLER, U.S.M.J.

Printed name and title